

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF OHIO  
WESTERN DIVISION (CINCINNATI)**

SEANNECA LIGGINS

Plaintiff,

vs.

BRIGHTVIEW, LLC, et al.

Defendants.

Case No. 1:22-cv-499

**NOTICE OF REMOVAL**

Now come the Defendants, Brightview, LLC, Kathryn Cure, and Victoria Scott, by and through counsel, pursuant to 28 U.S.C. § 1331 and 28 U.S.C. § 1441, and hereby removes this action from the Hamilton County, Ohio Court of Common Pleas to the United States District Court for the Southern District of Ohio, Western Division. In support of this Notice of Removal, Defendants aver as follows:

1. Plaintiff Seanneca Liggins (“Plaintiff”) initiated this action on July 19, 2022 by filing a Complaint in the Hamilton County, Ohio Court of Common Pleas styled *Seanneca Liggins v. Brightview, LLC, et al.*, Case No. A2202605.
2. A copy of the Complaint is attached as EXHIBIT 1.
3. A copy of the Classification Form is attached as EXHIBIT 2.
4. A copy of the Right to Sue is attached as EXHIBIT 3.
5. A copy of the Summonses are attached as EXHIBIT 4.
6. A Notification Form is attached as EXHIBIT 5.
7. Exhibits 1 through 5 constitute copies of all process, pleadings, and orders served on Defendants in the state court action at the time of removal.

8. Defendants were served with the Summons and Complaint on July 29, 2022.
9. The Complaint asserts claims pursuant to Title VII of the Civil Rights Act of 1964, 42 U.S.C. § 2000e.
10. Jurisdiction for such claim is proper in this Court pursuant to 42 U.S.C. § 2000e-5(f)(3).
11. The Complaint asserts a federal question providing original jurisdiction in this Court pursuant to 28 U.S.C. § 1331.
12. Removal is provided by 28 U.S.C. § 1441(a).
13. After filing this Notice of Removal, Defendants will promptly serve written notice of this Notice of Removal on counsel for all adverse parties and file the same with the Clerk of Courts for the Hamilton County, Ohio Court of Common Pleas in accordance with 28 U.S.C. § 1446(d).
14. By removing this action from the Hamilton County, Ohio Court of Common Pleas, Defendants do not waive any defenses available to them.
15. By removing this action from the Hamilton County, Ohio Court of Common Pleas, Defendants do not admit any of the allegations in the Complaint.

WHEREFORE, Defendants Brightview, LLC, Kathryn Cure, and Victoria Scott remove the above-captioned action from the Hamilton County, Ohio Court of Common Pleas to the United States District Court for the Southern District of Ohio, Western Division.

Respectfully submitted,



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**Counsel for Defendants**

**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing was served upon the following by electronic mail on August 26, 2022:

Evan R. McFarland, Esq.

Matthew G. Bruce, Esq.


Brianna R. Carden, Esq.

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**Counsel for Plaintiff**

  
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Adam J. Turer